

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DWAIN EDWARD THOMAS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 20-cv-944-D
	)	
KEVIN STITT, et al.,	)	
	)	
Defendants.	)	

**UNOPPOSED MOTION FOR EXTENSION OF DEADLINES**

Plaintiff Dwain Edward Thomas by and through his undersigned counsel, hereby moves the Court, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule LCvR 6.3, to briefly extend Plaintiff’s deadline to file responsive briefs to Defendants Kevin Stitt’s, Thomas Bates’s, T. Hastings Siegfried’s, and Steven Harpe’s (collectively “Defendants”) summary judgment motions by fourteen (14) days to **October 9, 2024**.<sup>1</sup> Defendants Bates, Siegfried, and Harpe do not oppose Plaintiff’s requested extension. Defendant Stitt also does not object to Plaintiff’s requested extension. In support of this motion, Plaintiff states the following:

1. On August 16, 2024, this Court entered its Scheduling Order (Doc. 113) extending Parties’ Joint Motion for Extension of Deadlines, requiring Parties to file their dispositive motions by August 30, 2024.

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<sup>1</sup> Defendant Bates’s motion for summary judgment was filed September 4, five days after the original summary judgment set by this Court, (Docs. 118, 119), making Plaintiff’s existing summary judgment deadline September 25, 2024. LCvR7.1(g).

2. In accordance with that deadline, Defendants Stitt, Siegfried, and Harpe filed their separate motions for summary judgment on August 30, 2024 (Docs. 114, 115, 116).

3. This Court granted Defendant Bates’s motion for a short extension to file his motion for summary judgment because “the servers for the Oklahoma Attorney General’s Office and other state agencies went down” during the process of filing that motion (Docs. 117 ¶ 3, 118). Defendant Bates filed his motion on September 4, 2024 (Doc. 119)—the fourth summary judgment motion filed by Defendants.

4. Now, Plaintiff respectfully requests a brief fourteen (14) day extension of Plaintiff’s deadline to file responsive briefs to Defendants’ summary judgment motions, from September 25, 2024 to October 9, 2024.

5. This extension is intended to give Plaintiff the necessary time to respond to four separate summary judgment motions totaling 97 pages.

6. The requested extension is not made for the purposes of delay.

WHEREFORE, Plaintiff respectfully requests the Court to enter an order granting the extension of deadlines as set forth above.

Dated: September 6, 2024

Respectfully submitted,

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